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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SONNI ECHEVERRIA-CORZAN,
individually and on behalf of all others
similarly situated,

Plaintiff,

v.

DOLLS KILL, INC.,

Defendant.

Case No. 3:24-cv-02040-WHO

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER TO STAY CASE AND CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE**

Hon. William H. Orrick

1 In accordance with Civil L.R. 6-1(b) and 6-2, Plaintiff Sonni Echeverria-Corzan (“Plaintiff”)
2 and Defendant Dolls Kill, Inc. (“Defendant,” and together with Plaintiff, the “Parties”), by and
3 through their respective undersigned counsel of record, hereby stipulate as follows:

4 WHEREAS, on September 25, 2024, the Parties filed a stipulation requesting to continue the
5 Initial Case Management Conference from October 8, 2024, at 2:00 p.m., to December 17, 2024, and
6 to adjust associated deadlines (Dkt. 17), and the Court issued an Order granting the Parties
7 stipulation (Dkt. 18);

8 WHEREAS, on November 19, 2024, the Parties participated in an in-person, full-day
9 mediation of this matter before the Honorable Judge Louis Meisinger;

10 WHEREAS, the Parties have reached a settlement and are currently in the process of
11 finalizing a long-form settlement agreement;

12 WHEREAS, on December 16, 2024, the Parties filed a stipulation requesting to continue the
13 Initial Case Management Conference from December 17, 2024, at 2:00 p.m., to February 11, 2025,
14 and to adjust associated deadlines (Dkt. 19);

15 WHEREAS, the Court issued an Order granting the Parties’ stipulation and stayed the case
16 for all purposes through the rescheduled Initial Case Management Conference to take place on
17 February 11, 2025 (Dkt. 20);

18 WHEREAS, on February 6, 2025, the Parties filed a stipulation requesting to continue the
19 Initial Case Management Conference from February 11, 2025, at 2:00 p.m., to March 11, 2025, and
20 to adjust associated deadlines (Dkt. 21);

21 WHEREAS, the Court issued an Order granting the Parties’ stipulation and stayed the case
22 for all purposes through the rescheduled Initial Case Management Conference to take place on
23 March 11, 2025 (Dkt. 22);

24 WHEREAS, on March 5, 2025, the Parties filed a stipulation requesting to continue the
25 Initial Case Management Conference from March 11, 2025, at 2:00 p.m., to April 15, 2025, and to
26 adjust associated deadlines (Dkt. 23);

1 WHEREAS, on April 8, 2025, the Parties filed a stipulation requesting to continue the Initial
2 Case Management Conference from April 15, 2025, at 2:00 p.m., to May 13, 2025, or a later date
3 otherwise convenient for the Court, and to adjust associated deadlines (Dkt. 25);

4 WHEREAS, the Court issued an Order granting the Parties' stipulation and stayed the case
5 for all purposes through the rescheduled Initial Case Management Conference to take place on June
6 3, 2025 (Dkt. 26);

7 WHEREAS, the Parties are in the final stages of finalizing a long-form settlement agreement
8 and require more time to complete it;

9 WHEREAS, in order to conserve resources while finalizing the settlement documentation,
10 the Parties stipulate, agree, and respectfully request that the Court extend the stay through July 1,
11 2025, reset the Initial Case Management Conference for July 1, 2025, at 2:00 p.m., or a later date
12 otherwise convenient for the Court, and that if the case is not dismissed before that conference, set a
13 deadline for Defendant to respond to the Complaint at the conference;

14 WHEREAS, this is the Parties' seventh request to continue the Initial Case Management
15 Conference, is for good cause, and no party would be prejudiced by the proposed continuance and
16 extension;

17 THEREFORE, IT IS STIPULATED and agreed, subject to the Court's approval, as follows:

- 18 1. The case is stayed for all purposes through and including July 1, 2025, at 2:00 p.m., at
19 which time the Court will hold an Initial Case Management Conference and set
20 deadlines in this case, including Defendant's deadline to respond to the Complaint, or
21 to such later date that is convenient for the Court;
 - 22 2. The only exception to this stay is that seven days before the Initial Case Management
23 Conference, the Parties shall provide the Court with the status of settlement.
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1 Dated: May 23, 2025

Respectfully submitted,

2 By: /s/ Grace Bennett

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10 *Attorneys for Plaintiff*

11
12 Dated: May 23, 2025

By: /s/ P. CRAIG CARDON

13 P. CRAIG CARDON

14 *Attorney for Defendant*

15 Dolls Kill, Inc.

16 **ATTESTATION OF COMPLIANCE**

17 In compliance with Civil Local Rule 5-1(i)(3), I attest that all other counsel on whose behalf
18 this filing is jointly submitted have approved of and concurred in this filing.


19
20 /s/ Grace Bennett

21 Grace Bennett

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 28, 2025


HONORABLE WILLIAM H. ORRICK
UNITED STATES DISTRICT COURT